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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
JOINT SUBMISSION IN RESPONSE TO  
DKT. 242 RE: STATUS OF DISCOVERY  
DISPUTES**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Defendant Google LLC's Administrative Motion to Seal portions of the parties' Joint Submission In Response to Dkt. 242 Re: Status of Discovery Disputes ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Document Sought to Be Sealed</b>	<b>Party Claiming Confidentiality</b>	<b>Court's Ruling on Motion to Seal</b>	<b>Basis for Sealing Portion of Document</b>
Joint Submission	Google	GRANTED as to redacted portions at:  pages 27, 37, 41, 43, 44	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers, and financial projections as well as Google's internal communications and practices with regard to Incognito, X-Client-Data Header and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge